



U.S. Department of Justice

United States Attorney
Eastern District of Missouri

Organized Crime Drug Enforcement Task Force

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August 25, 2020

DISCOVERY PROVIDED TO ATTORNEY VIA EMAIL AND INTEROFFICE COURIER

Kayla Williams
Assistant Federal Public Defender
Attorney for Defendant

In re: United States v. Darnell B. Pargo
 Cause No. 4:20-CR-00276-SRC-JMB

Dear Counsel:

As you are aware, your client was indicted by the Federal Grand Jury on June 10, 2020, for events which occurred on or about January 12, 2020, in St. Louis County, Missouri, within the Eastern District of Missouri. In order to assist you in the determination of any relevant pretrial motions to be filed in this case, please be aware of the following information:

1. **DISCOVERY** - The Government agrees to provide you with all relevant material within the purview of Federal Rule of Criminal Procedure 16.
2. **ELECTRONIC SURVEILLANCE** - At this time the Government is not in possession of electronic surveillance other than the information provided or referenced in the materials listed below and attached hereto. If that material contains or references any electronic surveillance that is not included in the material provided to you, the government has requested that information and will turn it over to the Defendant when it becomes available.
3. **CONFIDENTIAL INFORMANTS** - Government did utilize confidential informant(s) in the course of the investigation of this matter.
4. **JENCKS MATERIAL** - The Government agrees to make all Jencks material available no later than the Friday preceding trial, conditioned upon the Defendant's agreement to produce simultaneously statements of the Defendant's witnesses.
5. **GRAND JURY TRANSCRIPTS** - The Government agrees to produce, and make available for inspection, all Grand Jury transcripts to the extent they constitute Jencks material.

6. OTHER CRIMES EVIDENCE - The Government agrees to advise the Defendant of its intention to use evidence of other crimes during its case-in-chief. The Government agrees to make this disclosure prior to the trial of this cause.

7. STATEMENTS OF DEFENDANT - The Government is aware of statements made by the Defendant. Documents containing the substance of those statements are included in the discovery listed below.

8. IDENTIFICATION OF DEFENDANT - Post-arrest identification procedures related to the charged event are disclosed in the discovery materials listed below and the Government will continue to supplement any additional identification procedures as said information becomes available.

9. PHYSICAL EVIDENCE - The Government possess items of physical evidence seized from the Defendant. These items are available for inspection upon request.

10. FAVORABLE EVIDENCE - The Government agrees to furnish any and all favorable evidence to the Defendant if and when its existence becomes known to the Government. At the present time, the Government does not have any favorable evidence.

For your convenience, the following documents and recordings related to this matter have been uploaded to the USA File Exchange for your viewing or otherwise provided to you as noted:

- St. Louis County Police Department Report 20-1852 (6 pages);
- St. Louis County Police Department, Crime Laboratory, Laboratory Report # 20-001152 (3 pages);
- DEA Form 6, Report of Investigation, IF-20-0079 (3 pages);
- DEA Form 7, Report of Drug Property Collected, Purchased, or Seized, IF-20-0079 (2 pages).
- Photograph of Defendant (1 page).

Should you have any problems viewing the previously provided discovery, please contact me immediately. If you need any further specific information regarding the above matters, or any other matters, that will prevent the filing and litigation of any unnecessary pretrial motions, please do not hesitate to call me.

In order to avoid the need for filing motions pursuant to Federal Rules of Criminal Procedure 12.1(a), 16 and 26.2, the Government requests that:

A. The Defendant Provide the United States a written notice of the Defendant's intention to offer a defense of alibi, stating the specific place or places at which the Defendant claims to have been at the time of the alleged offense and the names and addresses of the witnesses upon whom the Defendant intends to rely to establish such alibi;

B. The Defendant provide the United States, or permit the United States to inspect and copy or photograph, books, papers, documents, photographs, tangible objects, or copies thereof, which are within the possession, custody or control of the Defendant and which the Defendant intends to introduce as evidence in chief at trial;

C. The Defendant provide the United States, or permit the United States to inspect and copy or photograph, any results or reports of physical or mental examinations and of scientific tests or experiments made in connection with the particular case, or copies thereof, within the possession or control of the Defendant, which the Defendant intends to introduce as evidence in chief at the trial or which were prepared by a witness whom the Defendant intends to call at the trial when the results or reports relate to his testimony;

D. The Defendant provide the United States a written summary of testimony the Defendant intends to use under Rules 702, 703, and 705 of the Federal Rules of Evidence as evidence at trial. This summary must describe the opinions of a witnesses, the bases and reasons thereof and the witnesses' qualifications;

E. The Defendant provide to the United States all statements of any defense witness that are in the Defendant's possession and that relate to the subject matter to which the witness will testify.

The Government requests that it receive the information regarding alibi requested in Section A no later than the date of the pretrial motion hearing. The Government also requests that the Defendant provide all information specified in Section E no later than noon on the Friday preceding trial to eliminate any delay in the trial of this cause.

I would appreciate a written response prior to any pretrial motion hearing to determine whether I will have to file formal requests for a court order to enforce discovery compliance. I thank you in advance for your anticipated cooperation.

Very truly yours,

JEFFREY B. JENSEN
United States Attorney

/s/ Nauman Wadalawala
BY: Nauman Wadalawala
Special Assistant United States Attorney

Encls.

cc: Clerk, United States District Court (w/o encls.)